

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PABLO STAR LTD.,

Plaintiff,

v.

THE WELSH GOVERNMENT, *et al.*,

Defendants.

Civil Action No. 15-CV-1167

**DECLARATION OF RICHARD J. OPARIL**

I, Richard J. Oparil, declare as follows:

1. I have personal knowledge of the facts stated herein and if called upon to do so, I could truthfully and competently testify thereto.

2. I am a principal with the law firm of Porzio, Bromberg & Newman P.C. I am a member of the District of Columbia and New York Bars and the Bar of this Court. I represent defendants Welsh Government and Tribune Content Agency, LLC.

3. I conducted a search of the website of the Secretary of State of the State of New York on August 21, 2018. No entity named "Pablo Star" is registered to do business in New York. Ex. 1 to the Memorandum in Support is a true and correct copy of the results of my search.

4. The Welsh Government is a political subdivision of the United Kingdom, which has been granted certain limited powers from the Parliament and Government of the United Kingdom to the National Assembly for Wales and to the executive body, the Welsh Government. Legislation creating devolved governments and legislatures can be repealed or amended by the UK Parliament in the same way as any statute. *See* U.K. Gov't of Wales Act 2006 (available at

<http://www.legislation.gov.uk/ukpga/2006/32/contents>). A report of the Commission on Devolution in Wales explained that:

Within the United Kingdom, the UK Parliament is sovereign and because of this the National Assembly (like the Scottish Parliament and Northern Ireland Assembly) is a subordinate body. This means that the UK Parliament can legislate on any area it wishes, whether it is devolved or not. However, a convention has arisen whereby the UK Parliament seeks the consent of the National Assembly before legislating in a devolved area. The UK Parliament does not have to abide by any decision of the National Assembly not to give consent, but can legislate regardless.

The legislation that created the National Assembly and Welsh Government (and all other devolved administrations), like all other legislation, can be repealed or amended by the UK Parliament.

Ex. 2 ¶ 2.2.21-22 (Mar. 2014); *see also* Commission on Devolution in Wales, *The Current Welsh Devolution Settlement* (Ex. 3). As part of its authority, the Welsh Government promotes tourism in Wales.

5. To the extent that the Welsh Government has offices in the United States, they are part of the British Embassy or Consulates, as reflected on Ex. 4.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Dated: August 23, 2018

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Richard J. Oparil